

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2015 AUG 10 PM 3:46

CLERK OF COURT

UNITED STATES OF AMERICA

v.

AVAN NGUYEN

Criminal No.

4-15CR-185-A

INFORMATION

The United States Attorney charges:

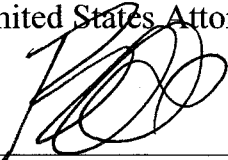
Count One

Aiding and Assisting in the Preparation and Presentation of a False and Fraudulent
Return, Statement, or Other Document
[Violation of 26 U.S.C. § 7206(2)]

On or about the September 7, 2012, in the Fort Worth Division of the Northern District of Texas, defendant **Avan Nguyen**, a resident of Arlington, Texas, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a 2011 corporate income tax return, Form 1120. The return was false and fraudulent as to a material matter, in that the return omitted approximately \$4,910,697.60 in income from "line 1" on the 2011 corporate income tax return, Form 1120, whereas, he then and there knew it should have been declared as income on the return.

In violation of Title 26, United States Code, Section 7206(2).

JOHN R. PARKER
United States Attorney



BRIAN D. POE
Assistant United States Attorney
Texas Bar No. 24056908
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8670
Email: brian.poe@usdoj.gov